

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

DOMINGO FIGUEROA CAMACHO;
JUDITH ALICEA AYALA

DEBTORS

CASE NO.: 08-05425 GAC

CHAPTER 13

REPLY TO TRUSTEE'S MOTION TO DISMISS

TO THE HONORABLE COURT:

COME NOWS, debtors in the above captioned case, through their undersigned attorney and respectfully avers and prays:

1. On October 7, 2008, Trustee filed a Motion requesting order to dismiss in the present case alleging that Debtor failed to amend schedules, Chapter 13 plan and provide or submit required documents.
2. That amended schedules have been submitted; Chapter 13 plan has been amended to surrender AEELA'S shares and payments increased to sufficiently fund plan; Trustee's payment has been sent. **(See docket numbers 20, 21 and attachment).**
3. The reasons for failure to amend schedules and submit documents and payments was that debtor's son has a serious medical condition that made them unavailable to provide the necessary documents and information to the suscribing attorney.
4. That it is debtors intention to comply with their duties as debtors under Chapter 13.

5. Debtor believes there is just cause to allow continuance of the Chapter 13 as explained above.

WHEREFORE, it is respectfully requested from this Honorable Court to deny Trustee's Motion to Dismiss and declare it moot.

I HEREBY CERTIFY: That on this same date, I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF Filing system which will send a notification of such filing upon information and belief to the Chapter 13 Trustee and to all subscribed users. We will serve by regular mail this motion to any creditor as per master address list upon knowing that they are non CM/ECF participants.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 9th day of October 2008.

/s/ HECTOR VELAZQUEZ HERNANDEZ

USDC PR 208313

P.O. Box 360847

San Juan, PR 00936-0847

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AMOUNT IN WORDS

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Alejandro Olivenas - Sindio

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